

EXHIBIT E

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18 **UNITED STATES DISTRICT COURT**

19 **NORTHERN DISTRICT OF CALIFORNIA**

IN RE TEZOS SECURITIES LITIGATION

22 This document relates to:

ALL ACTIONS.

Master File No. 17-cv-06779-RS

CLASS ACTION

**DECLARATION OF RONALD R. PUMA
IN SUPPORT OF PLAINTIFFS' MOTION
FOR CLASS CERTIFICATION**

Date: April 24, 2019

Time: 1:30 p.m.

Crtrm: 3

Judge: Hon. Richard Seeborg

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DECLARATION OF RONALD R. PUMA IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS CERTIFICATION
NO. 3:17-CV-06779-RS

DECLARATION OF RONALD R. PUMA

2 I, Ronald R. Puma, declare as follows pursuant to 28 U.S.C. § 1746:

3 1. I am a competent adult, over eighteen years of age, and at all times material to this 4 action
I have been a citizen of the United States and a resident of the State of Texas. I make this 5
Declaration in support of Plaintiffs' Motion for Class Certification and for Pumaro, LLC
("Pumaro") 6 to be appointed as a Class Representative in the above-caption action against

Dynamic Ledger 7 Solutions, Inc., Tezos Stiftung, Arthur Breitman and Kathleen Breitman (the “Action”).

8 2. I am the sole and managing member of Pumaro, a Texas Limited Liability Company.

9 3. Pumaro has agreed to act as a Class Representative in this Action, if so appointed by 10
the Court. Pumaro is seeking to be appointed by this Court as a Class Representative for the following
11 Class:

12 All persons and entities who, directly or indirectly through an intermediary,
13 contributed Bitcoin, Ethereum or U.S. dollars to the Tezos Initial Coin
14 Offering conducted in July 2017. Excluded from the Class are Defendants,
15 and any person, firm, trust, corporation, or other entity related to or affiliated with any
Defendant.

16 4. Like other members of the Class Pumaro seeks to represent, Pumaro invested in the
17 Tezos Initial Coin Offering that occurred between July 1, through July 14, 2017 (the “Tezos ICO”).

18 On July 1, 2017, in my capacity as managing member of Pumaro, I caused Pumaro to invest 1.9
19 Bitcoin into the Tezos ICO. Pumaro was promised 11,400 XTZ tokens in return. Pumaro did not
purchase XTZ tokens in the ICO at the direction of counsel or in order to participate in this Action.

20 5. As I understand it, the lawsuit seeks to remedy violations of the Securities Act of 1933
21 (the “Securities Act”) in connection with the Tezos ICO. As I understand it, the lawsuit alleges that
22 the Tezos ICO was an illegal, unregistered sale of securities in violation of the Securities Act.

23 6. I understand that as a Class Representative, Pumaro’s responsibilities and duties
24 include periodically monitoring and being familiar with matters occurring during the course of this
25 litigation, which I am able and willing to do on behalf of Pumaro and the Class. I know of no
reason
26 why Pumaro would or could not do so in the future, and as managing member, I intend to vigilantly
27 protect and advance the rights of other members of the Class.

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1 7. Pumaro previously sought to be appointed as Co-Lead Plaintiff over this
 2 Action pursuant to the Private Securities Litigation Reform Act. *See* Dkt No. 53. As part of
 3 that process, I received and reviewed a copy of the original complaint filed in this Action by
 4 GGCC, LLC. *See* Dkt. No. 1.

5 8. Since Pumaro moved for Co-Lead Plaintiff, I have continued to monitor this
 6 litigation through periodic telephone and email communications with counsel. Through this
 7 process, I have kept myself apprised of case developments and particular issues in the
 8 litigation, such as whether any terms and conditions governed the Tezos ICO.

9 9. Before moving to appoint Pumaro as a Class Representative, I received and
 10 reviewed Lead Plaintiff's Consolidated Complaint, filed April 3, 2018 (Dkt. No. 108) as
 11 amended pursuant to stipulation and order, entered November 21, 2018 (Dkt. No. 183).

12 10. I have neither been promised, nor have accepted, nor expect to receive, directly
 13 or indirectly, any compensation in connection with Pumaro's role as a Class Representative
 14 in this Action other than Pumaro's *pro rata* share of any recovery on behalf of the Class, and
 15 such reasonable costs and expenses (including lost wages) directly relating to representation
 16 of the Class as ordered or approved by the Court.

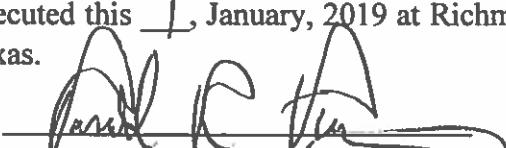
17 11. I further understand that a class representative is not permitted to compromise,
 18 undermine, or dismiss the Action in return for any special consideration not provided to other
 19 members of the Class, nor do I intend to do so in this Action.

20 12. I am aware of no conflicts of interest that would render Pumaro unqualified to
 21 carry out its duties and responsibilities as a Class Representative in this Action.

22 13. I have communicated with the other proposed Class Representative Artiom
 23 Frunze *via* conference call to discuss our duties as Class Representatives and the joint
 24 prosecution of this litigation. During this discussion, we addressed the ways we can cooperate
 25 to oversee this Action and our counsel. To this end, we have exchanged contact information
 26 to enable us to confer, with or without counsel, on short notice to ensure timely decision
 27 making.

1 I declare under penalty of perjury under the laws of the United States of America that the 2 foregoing
2 is true and correct.

3 Executed this 9, January, 2019 at Richmond,
4 Texas.

5 By 
6 Ron Puma, as managing member of
7 Pumaro, LLC

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